

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ROBERT JACKSON,)	
)	
Plaintiff,)	
)	
v.)	Civ. Act. No. 06-300-SLR
)	
CARL DANBERG, et al.,)	CLASS ACTION
)	
Defendants.)	

NOTICE OF FILING OF PAPER DOCUMENTS

Pursuant to the Court's June 27, 2008 order, Defendants hereby submit copies of the following materials produced by Defendants during the course of discovery:

A.	DCC Procedure Number 110-Execution Procedure, Dated 3/11/92.....	1
B.	DCC Procedure Number 110-Execution Procedure, Dated 2/26/93.....	130
C.	DCC Procedure 2.7-Execution Procedure, Dated 9/29/95.....	205
D.	DCC Procedure 2.7-Execution Procedure, Dated 3/1/99.....	279
E.	DCC Procedure 2.7-Execution Procedure, Dated 10/11/00.....	345
F.	DCC Procedure 2.7-Execution Procedure, Dated 8/1/05.....	408
G.	Telephone Watch Log—Inmate Steven Pennell.....	466
H.	Telephone Watch Log—Inmate James Allen Red Dog.....	488
I.	DCC Execution Log—Inmate Kenneth W. DeShields.....	506
J.	DCC Execution Log—Inmate Andre Deputy.....	532
K.	DCC Execution Log—Inmate Nelson Shelton.....	567
L.	DCC Execution Log—Hanging-Inmate Billy Bailey.....	607
M.	DCC Execution Log—Lethal Injection-Inmate William Flamer.....	640
N.	DCC Execution Log—Lethal Injection-Inmate James Clark.....	676

O.	DCC Execution Log—Lethal Injection-Inmate David Lawrie.....	712
P.	DCC Execution Log—Lethal Injection-Inmate Willie Sullivan.....	724
Q.	DCC Execution Log—Lethal Injection-Inmate Dwayne Weeks.....	738
R.	DCC Execution Log—Lethal Injection-Inmate David Dawson.....	748
S.	DCC Execution Log—Lethal Injection-Inmate Abdullah Hameen.....	762
T.	DCC Execution Log—Lethal Injection-Inmate Brian Steckel.....	771
U.	Autopsy Documents- Steven Pennell.....	785
V.	Autopsy Documents-James Allen Red Dog.....	1022
W.	Autopsy Documents-Kenneth Deshields.....	1264
X.	Autopsy Documents-Andre Deputy.....	1433
Y.	Autopsy Documents-Nelson Shelton.....	1560
Z.	Autopsy Documents-William Flamer.....	1627
AA.	Autopsy Documents-James Clark, Jr.....	1676
BB.	Autopsy Documents-David Lawrie.....	1717
CC.	Autopsy Documents-Willie Sullivan.....	1735
DD.	Autopsy Documents-Dwayne Weeks.....	1762
EE.	Autopsy Documents-David Dawson.....	1787
FF.	Autopsy Documents-Abdullah Hameen.....	1816
GG.	Autopsy Documents-Brian Steckel.....	1845
HH.	State of Delaware, Department of Correction Policy No. 2.7,	1904
II.	Bureau of Prisons Procedure No. 2.4.....	1905
JJ.	After Action Report on the execution of Brian Steckel.....	1945
KK.	Venous access memo re: Brian Steckel.....	1950

LL.	Death Watch Log Summary re: Brian Steckel.....	1952
MM.	Final Report on the execution of Abdullah Hameen, aka Cornelius Ferguson.....	1959
NN.	Venous access memo re: Abdullah Hameen.....	1965
OO.	Death Watch Log Summary re: Abdullah Hameen, aka Cornelius Ferguson.....	1968
PP.	Final Report on the execution of David Dawson.....	1988
QQ.	Venous access memo re: David Dawson.....	1996
RR.	Death Watch Log Summary re: David Dawson.....	1998
SS.	Final Report on the execution of Dwayne Weeks.....	2025
TT.	Venous access memo re: Dwayne Weeks.....	2030
UU.	Death Watch Log Summary re: Dwayne Weeks.....	2032
VV.	Final Report on the execution of Willie Sullivan.....	2034
WW.	Death Watch Log Summary re: Willie Sullivan.....	2039
XX.	Final Report on the execution of David Lawrie.....	2057
YY.	Venous access memo re: David Lawrie.....	2062
ZZ.	Death Watch Log Summary re: David Lawrie.....	2064
AAA.	Final Report on the execution of James Clark.....	2078
BBB.	Venous access memo re: James Clark.....	2080
CCC.	Death Watch Log Summary re: James Clark.....	2082
DDD.	Final Report on the execution of William Flamer.....	2097
EEE.	Venous access memo re: William Flamer.....	2098
FFF.	Death Watch Log Summary re: William Flamer.....	2100
GGG.	Final Report on the execution of Nelson Shelton.....	2115

HHH.	Venous access memo re: Nelson Shelton.....	2121
III.	Death Watch Log Summary re: Nelson Shelton.....	2123
JJJ.	Final Report on the execution of Andre Deputy.....	2140
KKK.	Venous access memo re: Andre Deputy.....	2145
LLL.	Death Watch Log Summary re: Andre Deputy.....	2148
MMM.	Final Report on the execution of Kenneth DeShields.....	2163
NNN.	Venous access memo re: Kenneth DeShields.....	2168
OOO.	Death Watch Log Summary re: Kenneth DeShields.....	2170
PPP.	Final Report on the execution of James Allen Red Dog.....	2179
QQQ.	Venous access memo re: James Allen Red Dog.....	2185
RRR.	Death Watch Log Summary re: James Allen Red Dog.....	2189
SSS.	Final Report on the execution of Steven Pennell.....	2203
TTT.	Death Watch Log Summary re: Steven Pennell.....	2210
UUU.	Letter dated February 24, 1992 to Bureau Chief Risley from Department of Justice.....	2228
VVV.	Death Watch Discussion Log Book.....	2230
WWW.	Bureau of Prisons Procedure Manual 2.4, dated February 1, 1993....	2414
XXX.	Department of Correction Policy No. 2.7, dated August 31, 2007.....	2444
YYY.	Bureau of Prisons Policy No. 2.7, dated August 31, 2007.....	2445
ZZZ.	Delaware Correctional Center Procedure No. 2.7, and attachments dated August 31, 2007.....	2446
AAAA.	Expert Report and Curriculum Vitae of Dr. Mark Dershwitz.....	2507
BBBB.	Delaware Correctional Center Procedure 2.7, Attachment #1, dated October 2, 2007.....	2529

Defendants hereby submit copies of the following materials written responses to interrogatories submitted by Defendants and Plaintiff during the course of discovery (these materials were not Bates-stamped):

Defendants' response to Plaintiff's motion for discovery

Defendants' response to Plaintiff's second discovery request

Defendants' response to Plaintiff's third discovery request

Defendants' response to Plaintiff's fourth discovery request

Plaintiff's response to Defendants' first set of interrogatories

Plaintiff's response to Defendants' first request for production

Defendants also hereby submit copies of the materials produced by Plaintiff during the course of discovery (numbered 1-212) referenced within Plaintiff's response to Defendants' first request for production.

STATE OF DELAWARE
DEPARTMENT OF JUSTICE

/s/ Gregory E. Smith
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Dated: July 18, 2008

CERTIFICATION OF SERVICE

The undersigned certifies that on July 18, 2008, he electronically filed the attached *Notice of Filing of Paper Documents* with the Clerk of Court using CM/ECF.

STATE OF DELAWARE
DEPARTMENT OF JUSTICE

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